

**REMARKS**

A review of the claims indicates that:

- A) Claims 1—34 are cancelled.
- B) Claims 35—54 are previously presented.
- C) Claims 48 is currently amended.

**Traversal of the §103 Rejections**

Claims 35—54 stand rejected under 35 U.S.C. §103(a) as being obvious over U.S. Application 20040066527A1, hereinafter “Kloosterman” in view of U.S. Patent 7,020,837 B1 hereinafter “Kueny.” In response, the Applicant respectfully traverses the rejection.

**Claim 35** recites a processor-readable medium comprising processor-executable instructions for generating a PPML (personalized print markup language) document and translating the PPML document into a PDF (portable document format) document, the processor-executable instructions comprising instructions for:

- **marking a first PDF document to create a PPML template, wherein portions of the first PDF document are marked to become variables in the PPML template and other portions of the first PDF document are marked to become a background in the PPML template;**
- **populating the PPML template with content and data, wherein the content and data are put into locations within the PPML template associated with the portions of the first PDF document marked to become variable, thereby creating the PPML document;**
- **parsing structures within the PPML document;**
- **generating a PDF document tree;**
- **populating the PDF document tree with objects identified when parsing the PPML document;**
- **configuring a second PDF document according to the PDF document tree; and**
- **printing the second PDF document.**

1       The Applicant submits that the Kloosterman reference does not teach or  
2 suggest “marking a first PDF document to create a PPML template, wherein  
3 portions of the first PDF document are marked to become variables in the PPML  
4 template and other portions of the first PDF document are marked to become a  
5 background in the PPML template”, as recited by Claim 35.

6       Generally, the Applicant submits that Kloosterman fails to teach or suggest  
7 that the PPML/VDX document is created by marking a PDF document to create  
8 the PPML template. Kloosterman teaches the creation of PPML documents using  
9 NexTreme®, but does not teach “marking a PDF document.” But more  
10 particularly, the Applicant submits that Kloosterman fails to teach the detail of  
11 marking portions of the PDF document to become variables and marking other  
12 portions of the PDF document to become background. Kloosterman teaches  
13 variables within the PPML/VDX document, and putting a PDF file into such  
14 variables, *but not variable or background creation by marking a PDF*. The details  
15 of *how* NexTreme® creates a PPML document are not central to Kloosterman, *and*  
16 *are not disclosed*.

17       However, the Patent Office suggests that Kloosterman, at paragraphs  
18 [0032] through [0035] teaches marking a PDF to create a PPML template, wherein  
19 the marking results in variables and background in the PPML template. The  
20 Applicant respectfully disagrees that Kloosterman makes such a teaching, and asks  
21 that the Office reconsider.

22       The Applicant submits that Kloosterman teaches that a PPML/VDX  
23 document is created using an appropriate application, such as NexTreme® (see  
24 page 4, left side column, lines 7 to 13 from the top). The operation of the  
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1 PPML/VDX file created by the NexTreme® application is seen at paragraph  
2 [0032] lines 11—13. Kloosterman teaches that “The graphical artist creates a  
3 template consisting of static images, graphics and text as well as variable images,  
4 graphics and text in VDP composition”. The Applicant observes that the output of  
5 operation of the NexTreme® application is the PPML/VDX document, which is  
6 essentially a PPML document enhanced by aspects of VDX. However, the  
7 Applicant submits that the NexTreme® is not central to the Kloosterman  
8 disclosure, and perhaps for that reason does not explicitly teach any method by  
9 which NexTreme® creates the PPML/VDX document.

10 The Office appears to suggest that the PDF files disclosed by Kloosterman  
11 at paragraphs [0033] to [0035] are analogous to the PDF file that the Applicant’s  
12 claim recites is marked to become a PPML template. The Applicant respectfully  
13 disagrees, and suggests that the role of the PDF file, as recited by Claim 35, is  
14 substantially different from the role of the PDF files taught by Kloosterman.

15 Kloosterman does teach that the PPML/VDX file has variables (e.g. the  
16 graphical box into which a PDF picture of a Lexis or Ford is inserted). However,  
17 Kloosterman does not teach or suggest that the variables are created by marking  
18 elements in a PFD file. Thus, the PDF files put into PPML variables by  
19 Kloosterman are not suggestive of the method of making a PPML document by  
20 marking a PDF file, as recited by Claim 35.

21 Claim 35 recites that PDF document is marked up, thereby creating the  
22 PPML template. In contrast, Kloosterman teaches that the variable parts (e.g. the  
23 graphical box in the last several lines of [0032]) are associated with PDF elements  
24 (e.g. Yugo.pdf) that are inserted into the variable parts. For example, the graphical  
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1 box is filled with any of several PDF files, such as Lexus, Ford or Yugo. Thus,  
2 Claim 35 recites marking up the PDF document to create a PPML document. In  
3 contrast, Kloosterman teaches that PDF document (e.g. "Yugo") can be used as  
4 variable values to be inserted into variables (e.g. the graphical box) in the  
5 PPML/VDX document. (See Kloosterman at [0032].) The Applicant respectfully  
6 submits that the Kloosterman teaching of using PDFs as variable values does not  
7 teach or suggest marking a PDF document to create a PPML template.

8 The Office also appears to suggest that because Kloosterman teaches  
9 PPLM/VDX documents, and because those documents have variable and non-  
10 variable elements, that the documents were necessarily created in the manner  
11 recited by Claim 35. The Applicant respectfully disagrees, and submits that there  
12 are many ways to create PPML templates, including Kloosterman's suggestion of  
13 applications as NexTreme®, which do not teach or suggest the elements of Claim  
14 35—such as marking a PDF to form variables and background.

15 In conclusion, the Applicant submits that Kloosterman's teaching of using  
16 PDF documents as variable values in a PPML document does not teach or suggest  
17 marking a PDF to create a PPML template. Moreover, the Applicant respectfully  
18 submits that the Kueny reference does not remedy the failings of Kloosterman.  
19 Accordingly, the Applicant respectfully requests that the Section 103 rejection be  
20 withdrawn.

21 **Claims 36—41** depend from Claim 35 and are allowable due to their  
22 dependence from an allowable base claim. These claims are also allowable for  
23 their own recited features that, in combination with those recited in Claim 35, are  
24 neither disclosed nor suggested in references of record, either singly or in  
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1 combination with one another. Accordingly, the Applicant respectfully requests  
2 that the Section 103 rejection of these claims be removed.

3 **Claims 42 and 49** were rejected under the same theory as Claim 35.  
4 Accordingly, the Applicant respectfully requests that the Section 103 rejection of  
5 these claims be removed.

6 **Claims 43—48 and 50—54** depend from Claims 42 and 49 and are  
7 allowable due to their dependence from an allowable base claim. These claims are  
8 also allowable for their own recited features that, in combination with those  
9 recited in Claims 42 and 49, are neither disclosed nor suggested in references of  
10 record, either singly or in combination with one another. Accordingly, the  
11 Applicant respectfully requests that the Section 102 rejection of these claims be  
12 removed.

13 **Conclusion**

14 The Applicant submits that the claims as presented are in condition for  
15 allowance. Accordingly, the Applicant respectfully requests that a Notice of  
16 Allowability be issued. If the Patent Office's next anticipated action is not the  
17 issuance of a Notice of Allowability, the Applicant respectfully requests that the  
18 undersigned attorney be contacted to schedule an interview.

19 Respectfully Submitted,

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